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Mario Alba Jr. malba@rgrdlaw.com

MEMO ENDORSE!

September 21, 2011

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Honorable John F. Keenan United States District Court Southern District of New York 500 Pearl Street, Room 1930 New York, NY 10007 USDC SDNY
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ELECTRONICALLY FILED
DOC 6:
DATE FILED: 9-23-11

Re: Plumbers, Pipefitters & MES Local Union No. 392 Pension Fund v. Fairfax

Financial Holdings Limited, et al.,

No. 1:11-cv-05097-JFK

Dear Judge Keenan:

My firm, along with Grant & Eisenhofer P.A. and Labaton Sucharow, LLP, has been retained to represent an institutional investor who wishes to make a motion for appointment as lead plaintiff in the above-referenced action. Pursuant to the Private Securities Litigation Reform Act of 1995, this motion must be made by any class member who wishes to seek appointment as a lead plaintiff, whether or not they have previously filed a complaint in this action, no later than 60 days following the publication of the first notice that was issued advising investors of the pendency of this action. See 15 U.S.C. §§78u-4(a)(3)(A) and (B). The notice in this action was published on July 25, 2011; accordingly, our client must file its motion no later than Friday, September 23, 2011.

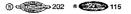
Your Honor's Individual Practices, however, require that "For motions other than discovery motions, a pre-motion conference with the court is required before making any motion...." We respectfully submit that, under these circumstances where we do not know the identities of any other potential lead plaintiff movants, and where filing of a motion is statutorily mandated by the 60-day limit, the requirement of a pre-motion conference should be waived and that leave be granted to file our motion on September 23, 2011.

Respectfully submitted,

Mario Alba Jr.

cc: All counsel on attached service list

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SERVICE LIST

Plumbers, Pipefitters & MES Local Union No. 392 Pension Fund v. Fairfax Financial Holdings Limited, et al., No. 1:11-cv-05097-JFK

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SO ORDERED.

Dated:

New York, N.Y.

Sept. 23, 2011

U.S.D.J.